

STATE PLAN FOR INDEPENDENT LIVING (SPIL)

Rehabilitation Act of 1973, as Amended, Chapter 1, Title

VII

PART B - INDEPENDENT LIVING SERVICES

Part C - Centers for Independent Living

State: Wisconsin

FISCAL YEARS: 2021-2023
Effective Date: October 1, 2020

According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless such collection displays a valid OMB control number (OMB 0985-0044). Public reporting burden for this collection of information is estimated to average 240 hours per response, including time for gathering and maintaining the data needed and completing and reviewing the collection of information. The obligation to respond to this collection is required to receive financial assistance (Title VII of the Rehabilitation Act of 1973, as amended).

Executive Summary

Concisely summarize the SPIL. Do not include anything that the SPIL's other sections do not include. An appropriate length for the executive summary is 1-2 pages.

The focus of Wisconsin's State Plan for Independent Living (SPIL) 2021-2023 is on strengthening the Wisconsin Independent Living Network (WILN) and providing quality Independent Living (IL) core services on a statewide basis. WILN is comprised of Wisconsin's eight Independent Living Centers (ILCs), the State Independent Living Council (SILC), and the Wisconsin Coalition of Independent Living Centers (WCILC). The mission for the SPIL embodies this focus and is: Through the provision of quality IL services throughout the state of Wisconsin, ensure that people with disabilities get to live the lives they choose.

Wisconsin's SILC has been in a period of transition the past two years, due the SILC members reaching term limits and staff transition. Wisconsin SILC has new membership and SILC member training and onboarding will be a priority during this three year SPIL period.

Training and onboarding for SILC members will focus on the Wisconsin SILC building collaborative relationships with Wisconsin's eight ILCs and WCILC so the SILC can effectively evaluate the SPIL and lead WILN in achieving the goals as outlined in the SPIL.

The SPIL development process has been a good first step in the Wisconsin SILC developing relationships with WILN and being able to apply skills and knowledge gained through ILRU training and SILC Congress to fulfill its roles and responsibilities as outlined in the assurances.

The SPIL goals emphasize two main themes, fulfilling the mission of the SPIL and improving collaboration of WILN. The 2021-2023 goals are:

- **Goal 1:** Wisconsin's eight ILCs will maintain their current number of individuals with disabilities who receive Independent Living (IL) core services on an annual basis.
- **Goal 2:** All of Wisconsin's eight ILCs will provide IL core services of the highest quality on an annual basis.
- **Goal 3:** Wisconsin IL Network actively engages in disability systems advocacy at the state and national levels on an annual basis.
- **Goal 4:** Strengthen coordination of the Wisconsin IL Network over the next three years.

Goal 4 in the SPIL was developed with collaboration and coordination of WILN as its focus. The Wisconsin SILC plans to achieve this goal by:

- Hosting a retreat for WILN, where partners will outline roles and responsibilities, and determine how to effectively and cohesively work together.
- Having Wisconsin SILC members increase the frequency of their contact with the respective ILCs that serve the county in which they reside so they understand local ILC and consumers' needs.
- Attending trainings offered related to onboarding of new SILC and WILN members and attend continuous training offered by WILN partners.

The other area the Wisconsin SILC will be focused on this SPIL three year period is the Resource Plan. Although Wisconsin provides IL core services on a statewide basis, more funding is needed to reach underserved populations and to open more ILC satellite state offices to reach underserved geographic regions of the state more efficiently. WILN will be pursuing an increase in state and federal resources to provide IL core services to more people with disabilities statewide.

For the 2021-2023 SPIL, the SILC Resource Plan funds totaling \$161,783 is allocated to the Wisconsin SILC. Funding is for the Resource Plan and to evaluate and meet SPIL goals.

The \$65,000 is allocated to WCILC for SPIL reporting and to meet SPIL goals.

The IL Services and General CIL Operations is allocated amongst Wisconsin's eight ILCs. ILCs receive Part C funds directly. The DSE allocates Part B, Independent Living State General Purpose Revenue, and Social Security Act funds to the ILCs.

The Designated State Entity (DSE) issues funds to the ILCs, WCILC, and SILC as outlined in the SPIL Financial Plan. The DSE allocates I&E, Part B funds, and Part B match funds on a federal fiscal year basis (October 1 – September 30). The DSE allocates the Social Security Reimbursement and state general purpose revenue on a state fiscal year basis (July 1 – June 30). Prior to receiving these funds and related contracts the DSE will issue grant continuation packets to be completed by the SILC, WCILC, and ILCs. The grant continuation packet is issued 60 days prior to the start of the fiscal year. The grant continuation packets include a budget form to be completed, scope of work, and quarterly program and budget reports. The grant packets are due to the DSE 30 days prior to the start of the fiscal year. Grant funds are available at the start of the fiscal year and are available to draw upon on a monthly basis.

The ILCs receive Part C and CARES Act funds directly from the federal government.

Section 1: Goals, Objectives and Activities

1.1 Mission:

Mission of the Independent Living Network and the SPIL.

The Wisconsin Independent Living Network (WILN) is comprised of Wisconsin's eight Independent Living Centers, the State Independent Living Council, and the Wisconsin Coalition of Independent Living Centers.

The mission for the Wisconsin State Plan for Independent Living (SPIL) 2021 - 2023 is:

Through the provision of quality Independent Living (IL) services throughout the state of Wisconsin, ensure that people with disabilities get to live the lives they choose.

1.2 Goals:

Goals of the IL Network for the three-year period of the plan.

The SPIL goals of the Wisconsin Independent Living Network (WILN) for 2021 – 2023 are:

- **Goal 1:** Wisconsin's eight Independent Living Centers (ILCs) will maintain their current number of individuals with disabilities who receive Independent Living (IL) core services on an annual basis.
- **Goal 2:** All of Wisconsin's eight ILCs will provide IL core services of the highest quality on an annual basis.
- **Goal 3:** WILN actively engages in disability systems advocacy at the state and national levels on an annual basis.
- **Goal 4:** Strengthen coordination of WILN over the next three years.

1.3 Objectives

Objectives for the three-year period of the plan – including geographic scope, desired outcomes, target dates, and indicators. Including compatibility with the purpose of Title VII, Chapter 1.

- **Goal 1/Desired Outcome:** Wisconsin's eight Independent Living Centers (ILCs) will maintain their current number of individuals with disabilities who receive Independent Living (IL) core services on an annual basis.
 - **Objective 1.1:** All ILCs will maintain their current total number of unduplicated Information and Referral (I&R) and Consumer Information File (CIF) for IL core services per each ILC service area.
 - **Geographic Scope:** Statewide by ILC service area.
 - **Target Date:** On an annual basis maintain the number of individuals who receive IL core services.
 - **Indicator 1.1:** The total of unduplicated I&Rs and CIFs for each ILC service area.
 - **Compatibility with the purpose of Title VII, Chapter 1:** Relates to IL

services and CILs.

- **Goal 2/Desired Outcome:** All of Wisconsin's eight ILCs will provide IL core services of the highest quality on an annual basis.
 - **Objective 2.1:** Seventy-five percent of consumers receiving IL core services have “successfully completed all goals” at the time of the closure of their individual CIF.
 - **Geographic Scope:** Statewide by ILC service area.
 - **Target Date:** On an annual basis ILCs provide IL core services of the highest quality.
 - **Indicator 2.1:** Percentage of consumers meeting goals at time of CIF closure.
 - **Compatibility with the purpose of Title VII, Chapter 1:** Relates to IL services and CILs.
 - **Objective 2.2:** On annual basis at least one ILC will complete a Quality Indicators for Independent Living Services (QUILS) Peer Review.
 - **Geographic Scope:** Statewide by ILC service area.
 - **Target Date:** On an annual basis ILCs provide IL core services of the highest quality.
 - **Indicator 2.2:** Number of QUILS Peer Reviews completed.
 - **Compatibility with the purpose of Title VII, Chapter 1:** Relates to IL services and CILs.
- **Goal 3/Desired Outcome:** Wisconsin IL Network (WILN) actively engages in disability systems advocacy at the state and national levels on an annual basis.
 - **Objective 3.1:** Develop and implement an IL Network three-year disability systems advocacy plan.
 - **Geographic Scope:** Statewide and National.
 - **Target Date:** On an annual basis IL Network participates in disability advocacy.
 - **Indicator 3.1:** Percentage of Wisconsin IL Network engaged in disability systems advocacy goals.
 - **Compatibility with the purpose of Title VII, Chapter 1:** Relates to IL services and CILs.
 - **Objective 3.2:** Use the annual consumer barriers survey data to prioritize the disability systems advocacy plan.
 - **Geographic Scope:** Statewide by ILC service area.
 - **Target Date:** On an annual basis IL Network participates in disability advocacy.
 - **Indicator 3.2:** Number of annual consumer barriers surveys completed.

- **Compatibility with the purpose of Title VII, Chapter 1:** Relates to IL services and CILs.
- **Goal 4/Desired Outcome:** Strengthen coordination of WILN over the next three years
 - **Objective 4.1:** Develop and implement an IL Network three-year collaboration plan that includes, when appropriate, partnership with the Designated State Entity (DSE) that has measurable outcomes.
 - **Geographic Scope:** Statewide.
 - **Target Date:** Within three years host a retreat and provide ongoing training to Council members. On an annual basis SILC members will have contact with their local ILC.
 - **Indicator 4.1:** A retreat of the Wisconsin IL Network, along with the DSE, where partners will outline roles and responsibilities and determine how to effectively work cohesively together.
 - **Indicator 4.2:** Frequency of contacts between Wisconsin SILC members and the respective ILCs that serve the county in which they reside.
 - **Indicator 4.3:** Number of trainings offered to members of the IL Network related to onboarding of new Council Members and continuous training of IL Network partners.
 - **Compatibility with the purpose of Title VII, Chapter 1:** Relates to CILs.

1.4 Evaluation

Methods and processes the SILC will use to evaluate the effectiveness of the SPIL including timelines and evaluation of satisfaction of individuals with disabilities.

Per THE REHABILITATION ACT OF 1973, AS AMENDED (by the Workforce Innovation and Opportunity Act (WIOA) in 2014), § 1329.15(a) (2) The SILC shall monitor, review, and evaluate the implementation of the SPIL on a regular basis as determined by the SILC and set forth in the SPIL. In addition, under SILC Indicator (5): The SILC monitors, reviews and evaluates the State Plan in accordance with 45 CFR 1329.15(a)(2).

The Wisconsin SILC will monitor, review, and evaluate the SPIL using the following agreed to performance measures:

- **Goal 1:** Wisconsin's eight Independent Living Centers (ILCs) will maintain their current number of individuals with disabilities who receive Independent Living (IL) core services on an annual basis.
 - **Objective 1.1:** All ILCs will maintain their current total number of unduplicated Information and Referral (I&R) and Consumer Information Files (CIFs) for IL core services per each ILC service area.
 - **Indicator 1.1:** The total of unduplicated I&Rs and CIFs for each ILC service area.

- **Evaluation Plan**
 - *Reporting/Evaluation:*
 - Wisconsin SILC will receive quarterly reports on these indicators.
 - Wisconsin SILC will receive a copy of each ILCs' annual Program Performance Report.
 - *Data Source:*
 - Statewide consistent data collection by using the same Management Information System (MIS)
 - *Data Points:*
 - Number of open files receiving one or more IL core services per ILC service area.
 - Number of unduplicated callers for Information and Referral services per ILC service area.
 - *Goal Leads:*
 - WCILC, ILCs
- **Goal 2:** All of Wisconsin's eight ILCs will provide IL core services of the highest quality on an annual basis.
 - **Objective 2.1:** Seventy-five percent of consumers receiving IL core services have "successfully completed all goals" at the time of the closure of their individual CIF.
 - **Indicator 2.1:** Percentage of consumers meeting goals at time of CIF closure.
 - **Objective 2.2:** On annual basis at least one ILC will complete a Quality Indicators for Independent Living Services (QUILS) Peer Review.
 - **Indicator 2.2:** Number of QUILS Peer Reviews completed.
- **Evaluation Plan**
 - *Reporting/Evaluation:*
 - Wisconsin SILC will receive quarterly reports on these indicators.
 - Wisconsin SILC receive a pre- and post-survey assessment of QUILS Peer Review, annually.
 - Wisconsin SILC will receive a copy of each ILCs' annual Program Performance Report.
 - *Data Sources:*
 - Statewide consistent data collection by using the same Management Information System (MIS)

- QUILS Peer Review tool and process
- *Data Points:*
 - Percentage of consumers receiving IL core services meeting all their goals at CIF closure per ILC service area.
 - QUILS Peer Review pre- and post-survey assessment.
- *Goal Leads:*
 - WCILC, ILCs
- **Goal 3:** Wisconsin IL Network (WILN) actively engages in disability systems advocacy at the state and national levels on an annual basis.
 - **Objective 3.1:** Develop and implement an IL Network three-year disability systems advocacy plan.
 - **Indicator 3.1:** Percentage of Wisconsin IL Network engaged in disability systems advocacy goals.
 - **Objective 3.2:** Use the annual consumer barriers survey data to prioritize the disability systems advocacy plan.
 - **Indicator 3.2:** Number of annual consumer barriers surveys completed.
 - **Evaluation Plan**
 - *Reporting/Evaluation:*
 - Wisconsin SILC will receive quarterly reports on these indicators.
 - Annual consumer barriers survey data.
 - *Data Sources:*
 - Annual consumer barriers survey data
 - WCILC quarterly reports
 - *Data Point:*
 - Participation of Wisconsin IL Network members in disability systems advocacy.
 - *Goal Lead:*
 - WCILC
- **Goal 4:** Strengthen coordination of WILN over the next three years
 - **Objective 4.1:** Develop and implement an IL Network three-year collaboration plan that includes partnership, when appropriate, partnership with the Designated State Entity (DSE) that has measurable outcomes.

- **Indicator 4.1:** A retreat of WILN, where partners will outline roles and responsibilities, and determine how to effectively work cohesively together.
- **Indicator 4.2:** Frequency of contacts between Wisconsin SILC members and the respective ILCs that serve the county in which they reside.
- **Indicator 4.3:** Number of trainings offered to members of the IL Network related to onboarding of new Council Members and continuous training of IL Network partners.

- **Evaluation Plan**

- *Reporting/Evaluation:*

- Annual report on collaborative activities of the IL Network and DSE partner.
 - Individual Wisconsin SILC Member Training Plans, updated annually

- *Data Sources:*

- Wisconsin SILC quarterly program report
 - Wisconsin SILC Program Performance Report
 - Reports from Wisconsin SILC members about contacts with ILCs
 - Pre- and Post- training surveys

- *Data Points:*

- ILCs attendance at Wisconsin SILC Quarterly and Executive Committee meetings
 - Wisconsin SILC member contacts with ILCs (e.g. phone calls, e-mails, in-person visits)
 - Training survey results

- *Goal Lead:*

- Wisconsin SILC

Wisconsin SILC conducted a needs assessment to evaluate the needs and satisfaction of people with disabilities who received IL core services. The SILC analyzed Program Performance Report data from the ILCs for the previous three years, ILC consumer satisfaction survey data, and consumer barriers survey. In addition the Wisconsin SILC had two pre-SPIL development public hearings. The information gleaned from the data analysis and public hearings was used to develop the SPIL, 2021-2023.

During year one of the SPIL, Wisconsin SILC, will work to create and develop a survey to gather information for a statewide needs assessment to gather input from stakeholder groups (e.g.

people with disabilities, ILCs, consumer councils, and other disability groups) to better understand their needs and opportunities for addressing these needs.

In addition, the Wisconsin SILC will continue to analyze ILC consumer satisfaction survey data and consumer barrier survey data on an annual basis.

Wisconsin SILC also provides an opportunity for people to provide feedback on the SPIL, IL services, and barriers experienced at every public meeting of the SILC.

In addition, it is important the Wisconsin SILC ensure the needs of the ILCs are being met so WILN can serve more people with disabilities statewide. During the SPIL three year period, the Wisconsin SILC will send a survey to ILC directors to see if they have enough resources, have unmet needs, or other concerns that WILN can work on collaboratively to better meet the needs of people with disabilities.

1.5 Financial Plan

Sources, uses of, and efforts to coordinate funding to be used to accomplish the Goals and Objectives. Process for grants/contracts, selection of grantees, and distribution of funds to facilitate effective operations and provision of services.

| Fiscal Year(s): 2021-2023 | | | | | | |
|---|------------------------------------|-------------|------------------------|------------------|-----------------------|---|
| Sources | Projected Funding Amounts and Uses | | | | | |
| | SILC Resource Plan | IL Services | General CIL Operations | CARES Act Funds* | Other SPIL Activities | Retained by DSE for Administrative costs (applies only to Part B funding) |
| Title VII Funds | | | | | | |
| Chapter 1, Part B (including state match) | \$101,783 | \$172,496 | | | \$65,000 | |
| Chapter 1, Part C | | | \$1,146,900 | \$1,256,030 | | |
| | | | | | | |
| Other Federal Funds | | | | | | |
| Sec. 101(a)(18) of the Act (Innovation and Expansion) | \$60,000 | | | | | |
| Social Security Reimbursement | | | \$600,000 | | | |
| Other | | | | | | |
| | | | | | | |
| Non-Federal Funds | | | | | | |
| State Funds | | | \$983,500 | | | |
| Other | | | | | | |

*Estimates of CARES Act funds based on most recent information available.

\$34,200 is provided in state general purpose revenue is associated with state match. In addition, the DSE staff is also provided as state match. The DSE does not retain any federal Part B funds and staff positions are 100% funded with state general purpose revenue.

The SILC Resource Plan funds totaling \$161,783 is allocated to the Wisconsin SILC. Funding is for the Resource Plan and to evaluate and meet SPIL goals.

The \$65,000 is allocated to WCILC for SPIL reporting and to meet SPIL goals.

The IL Services and General CIL Operations is allocated amongst Wisconsin's eight ILCs. ILCs receive Part C funds directly. The DSE allocates Part B, Independent Living State General Purpose Revenue, and Social Security Act funds to the ILCs based on Section 3.1 of the SPIL (see chart below).

| Agency | Funding Source/Program: Part B (amount includes federal & state match) | Funding Source/Program: State IL GPR | Funding Source/Program: Social Security Reimbursement | Funding Source/Program: I&E | TOTAL Award (all funding sources) |
|------------------------|---|---|--|--|--|
| Access to Independence | \$21,562 | \$44,395 | \$27,085 | | \$93,042 |
| Society's Assets | \$21,562 | \$182,682 | \$111,448 | | \$315,692 |
| Independence First | \$21,562 | \$19,483 | \$11,887 | | \$52,932 |
| North Country IL | \$21,562 | \$182,682 | \$111,448 | | \$315,692 |
| CILWW | \$21,562 | \$6,212 | \$3,788 | | \$31,562 |
| ILR | \$21,562 | \$182,682 | \$111,448 | | \$315,692 |
| Options | \$21,562 | \$182,682 | \$111,448 | | \$315,692 |
| Mid-State | \$21,562 | \$182,682 | \$111,448 | | \$315,692 |
| WCILC | \$65,000 | | | | \$65,000 |
| Wisconsin SILC | \$101,783 | | | \$60,000 | \$161,783 |
| TOTAL | \$339,279 | \$983,500 | \$600,000 | \$60,000 | \$1,982,779 |

Centers for Independent Living (CILs) have received \$85 million in COVID-19 Aid, Relief, and Economic Security Act (CARES Act) supplemental funding. Wisconsin ILCs will be receiving \$1,256,030 in CARE Act funds, based on most recent information available as of April 2020. The CARES Act funds Wisconsin receives will be used for IL services that assist people with disabilities to remain safe, connected and independent in their communities, along with covering expenses related to CO-VID including IT/Technology, staff salaries, wages and leave, and CO-VID related supplies.

The amount of CARES Act funding each ILC will receive as well as each ILCs service area is listed in the chart below.

| Independent Living Center | Counties Served | CARE Act Funds |
|---|--|-----------------------|
| Access to Independent Living | Columbia, Dane, Dodge, Green | \$ 311,227 |
| Center for Independent Living for Western Wisconsin | Polk, Barron, Rusk, St. Croix, Dunn, Chippewa, Pierce, Pippin, Eau Claire, Clark | \$ 452,451 |
| Independence First | Milwaukee, Washington, Waukesha, Ozaukee | \$340,669 |
| Independent Living Resources | Crawford, Richland, Sauk, Iowa, Grant, Lafayette, Vernon, La Crosse, Monroe, Jackson, Trempealeau, Buffalo, Juneau | \$30,337 |
| Midstate Independent Living Choices | Adams, Florence, Forest, Langlade, Lincoln, Marathon, Oneida, Portage, Taylor, Vilas, Wood | \$30,337 |
| North Country Independent Living | Douglas, Bayfield, Ashland, Iron, Price, Sawyer, Washburn, Burnett | \$30,337 |
| Options for Independent Living | Door, Kewaunee, Manitowoc, Brown, Sheboygan, Fond du Lac, Calumet, Green Lake, Marquette, Winnebago, Waupaca, Waushara, Outagamie, Shawano, Menominee, Marinette, Oconto | \$30,337 |
| Society's Assets Incorporated | Jefferson, Kenosha, Racine, Rock, Walworth | \$30,337 |

In recent years, there have been decreases in CIL operating funds and one-time increases that threaten the ability of some ILCs to maintain their current level of services. We value the importance of input from the ILCs and the Wisconsin SILC in making decisions regarding funding at both the State and Federal level. We also recognize the importance of implementing our long-standing policy regarding funding equity within the ILCs.

Note, we use the term "base funds" to refer to funds appropriated under federal and state law to provide general support for the operation of Centers for Independent Living and independent living services when those funds are generally expected to be available from year-to-year. We include as base funds, those authorized under the Rehabilitation Act of 1973, as amended, Title VII, Chapter 1, subchapter C and Social Security Reimbursement funds, and under sec.46.96(2), Wis. Stats.

A strong network serves to increase access to services for people with disabilities. Adherence to our funding equity policy keeps the network strong. The fundamental aspect of our funding equity policy is that all ILCs go up or down together. Equity in funding increases or decreases in a given year occurs when the difference between the "base funds" for that year and for the prior year are essentially equal for each ILC.

Other aspects of our funding equity policy restrict application of new funds to start a new Center when that might endanger funding to the existing Network and/or be unsustainable for a new center. An appropriation providing new funds should not cause funding a new ILC unless the

funding is expected to continue from year-to-year indefinitely. Nor should a new ILC be started until all ILCs in the existing Network receive at least our "base funding target," currently \$580,000 in base funds. We have determined this figure to reflect the cost to operate an ILC at a fully compliant level that we believe all ILCs should meet.

WILN will prioritize new (non-one-time funding) based on the following three priorities, in order, for when new funds (beyond the cost-of-living increase) are available:

- 1. Maintain the ability of each ILC in the existing Network to serve its consumers at 2008 funding levels (levels received for the performance period from October 2007 through September 2008).** Federal Fiscal Year 2008 was the chosen baseline because at the time it was the high-water mark for all of the ILCs, including the five that were now receiving federal funds, and had increases or steady funding from one year to the next, and all of the ILCs had achieved our previous base funding target of \$300,000.
- 2. Support existing ILCs and achieve \$580,000 base funding target per ILC;** and
- 3. Provide additional resources to support IL services in the most underserved service area** using the methodology determined by the WILN during the next three years.

Funding Priorities Note: The methodology employed to adhere to the principle of Priority 1 and 2 above since 2003 has been to use the non-federal base funds appropriations to provide centers with a proportionate increase in that year that is as equitable across the network as is practicable. All centers in the network receive "base fund" contracts described earlier. Historically, however, some centers in the network established at an earlier time (1979-80) receive a much larger subchapter C award than centers formed later funded primarily by state statute 46.96. With the full concurrence of the entire IL network including the DSE that also serves as the administrator of the state funds, those centers founded later receive a larger state base funding contract relative to those centers which hold a larger subchapter C award. Therefore, when the IL network is in receipt of a letter from the Administrator that new federal funds beyond COLA are available in any given year and asking how the network wishes to distribute those funds in line with the current approved SPIL, it the process described above that is used. The state based funds contracts are modified in an attempt to level out the impact of the increases so as not to exacerbate the historical imbalance in base funds available for all centers to carry out the requirements of a CIL contained in state and federal law.

Grant processes, policies, and procedures to be followed by the DSE in the awarding of grants of Subchapter B funds.

The DSE issues funds to the ILCs, WCILC, and SILC as outlined in the State Plan for Independent Living Financial Plan. The DSE allocates I&E, Part B funds, and Part B match funds on a federal fiscal year basis (October 1 – September 30). The DSE allocates the Social Security Reimbursement and state general purpose revenue on a state fiscal year basis (July 1 – June 30). Prior to receiving these funds and related contracts the DSE will issue grant continuation packets to be completed by the SILC, WCILC, and ILCs. The grant continuation packet is issued 60 days prior to the start of the fiscal year. The grant continuation packets include a budget form to be completed, scope of work, and quarterly program and budget reports.

The grant packets are due to the DSE 30 days prior to the start of the fiscal year. Grant funds are available at the start of the fiscal year and are available to draw upon on a monthly basis.

ILCs receive Part C funds and CARES Act funds directly from the federal government.

Section 2: Scope, Extent, and Arrangements of Services

2.1 Services

Services to be provided to persons with disabilities that promote full access to community life including geographic scope, determination of eligibility and statewideness.

IL core services are provided in all 72 counties of Wisconsin to people with disabilities, there is no additional eligibility determination other than an individual's self-identification as a person with a disability. For some of the optional services below, people with disabilities may need to be enrolled in specific programs to receive services such as being a consumer of Division of Vocational Rehabilitation or enrolled in IRIS self-directed program. ILCs receive contracts and grants to provide optional services, therefore services may vary by county.

| Table 2.1A: Independent living services | Provided using Part B (check to indicate yes) | Provided using other funds (check to indicate yes; do not list the other funds) | Entity that provides (specify CIL, DSE, or the other entity) |
|---|--|--|---|
| Core Independent Living Services, as follows: | | | |
| - Information and referral | X | X | CIL |
| - IL skills training | X | X | CIL |
| - Peer counseling | X | X | CIL |
| - Individual and systems advocacy | X | X | CIL |
| - Transition services including: | | | |
| ▪ Transition from nursing homes & other institutions | | | |
| ▪ Diversion from institutions | | | |
| ▪ Transition of youth (who were eligible for an IEP) to post-secondary life | | | |
| Counseling services, including psychological, psychotherapeutic, and related services | | | |

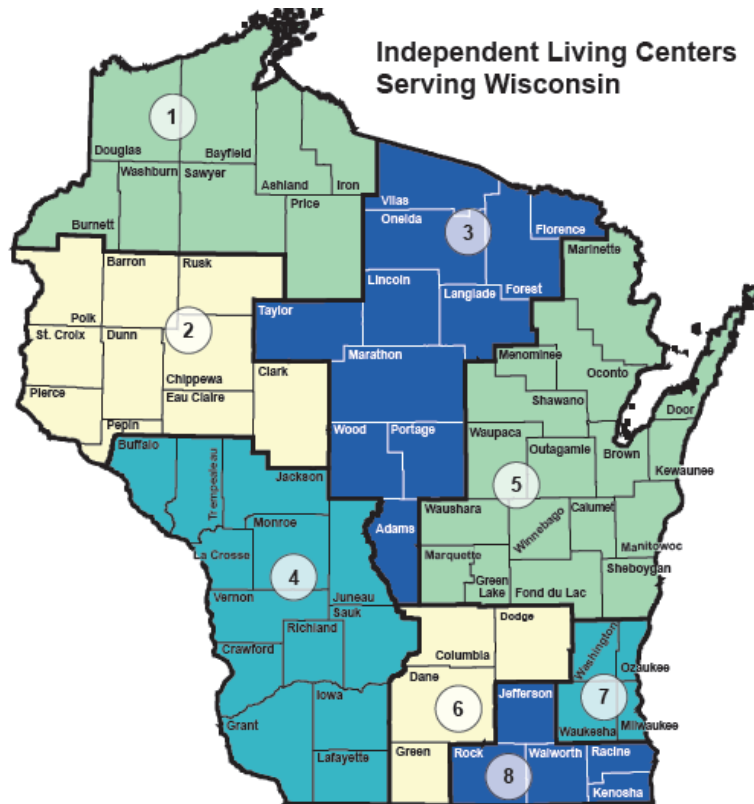
| Table 2.1A: Independent living services | Provided using Part B (check to indicate yes) | Provided using other funds (check to indicate yes; do not list the other funds) | Entity that provides (specify CIL, DSE, or the other entity) |
|---|--|--|---|
| Services related to securing housing or shelter, including services related to community group living, and supportive of the purposes of this Act and of the titles of this Act, and adaptive housing services (including appropriate accommodations to and modifications of any space used to serve, or occupied by, individuals with disabilities) Note: CILs are not allowed to own or operate housing. | | X | CIL |
| Rehabilitation technology | | X | CIL |
| Mobility training | | X | CIL |
| Services and training for individuals with cognitive and sensory disabilities, including life skills training, and interpreter and reader services | | X | CIL |
| Personal assistance services, including attendant care and the training of personnel providing such services | | X | CIL |
| Surveys, directories, and other activities to identify appropriate housing, recreation opportunities, and accessible transportation, and other support services | | X | CIL |
| Consumer information programs on rehabilitation and IL services available under this Act, especially for minorities and other individuals with disabilities who have traditionally been unserved or underserved by programs under this Act | | X | CIL |
| Education and training necessary for living in the community and participating in community activities | | X | CIL |
| Supported living | | | |
| Transportation, including referral and assistance for such transportation | | X | CIL |
| Physical rehabilitation | | | |
| Therapeutic treatment | | | |
| Provision of needed prostheses and other appliances and devices | | | |

| Table 2.1A: Independent living services | Provided using Part B (check to indicate yes) | Provided using other funds (check to indicate yes; do not list the other funds) | Entity that provides (specify CIL, DSE, or the other entity) |
|---|--|--|---|
| Individual and group social and recreational services | | X | CIL |
| Training to develop skills specifically designed for youths who are individuals with significant disabilities to promote self-awareness and esteem, develop advocacy and self-empowerment skills, and explore career options | | X | CIL |
| Services for children | | X | CIL |
| Services under other Federal, State, or local programs designed to provide resources, training, counseling, or other assistance, of substantial benefit in enhancing the independence, productivity, and quality of life of individuals with disabilities | | X | CIL |
| Appropriate preventive services to decrease the need of individuals with significant disabilities for similar services in the future | | X | CIL |
| Community awareness programs to enhance the understanding and integration into society of individuals with disabilities | | X | CIL |
| Such other services as may be necessary and not inconsistent with the Act | | X | CIL |

2.2 Outreach

Identify steps to be taken regarding statewide outreach to populations that are unserved or underserved by programs that are funded under Title VII, including minority groups and urban and rural populations.

Wisconsin's eight Independent Living Centers (ILCs) provide Independent Living core services in all 72 counties of the state. See service area map below.



- 1. North Country Independent Living**
Counties Served: Ashland, Bayfield, Burnett, Douglas, Iron, Price, Sawyer, Washburn
- 2. Center for Independent Living for Western Wisconsin**
Counties Served: Barron, Chippewa, Clark, Dunn, Eau Claire, Pepin, Pierce, Polk, Rusk, St. Croix
- 3. Midstate Independent Living Choices**
Counties Served: Adams, Florence, Forest, Langlade, Lincoln, Marathon, Oneida, Portage, Taylor, Vilas, Wood
- 4. Independent Living Resources**
Counties Served: Buffalo, Crawford, Grant, Iowa, Jackson, Juneau, La Crosse, Lafayette, Monroe, Richland, Sauk, Trempealeau, Vernon
- 5. Options for Independent Living**
Counties Served: Brown, Calumet, Door, Fond du Lac, Green Lake, Kewaunee, Manitowoc, Marinette, Marquette, Menominee, Oconto, Outagamie, Shawano, Sheboygan, Waupaca, Waushara, Winnebago
- 6. Access to Independence**
Counties Served: Columbia, Dane, Dodge, Green
- 7. Independence First**
Counties Served: Milwaukee, Ozaukee, Washington, Waukesha
- 8. Society's Assets**
Counties Served: Jefferson, Kenosha, Racine, Rock, Walworth

The Wisconsin Independent Living Council, Independent Living Centers, Wisconsin Coalition of Independent Living Centers, and Designated State Entity have thoroughly analyzed the service data from Program Performance Reports for four target population segments (geographic location, age, race, and disability type) on annual basis (See Charts 1, 2, 3, and 4). In Wisconsin, “served” means a person with a disability has received Information and Referral (I&R) service and/or has a Consumer Information File (CIF). We find that no part of the State or any target population segment is “unserved”, meaning in each county at least one I&R service and/or CIF has been provided in each of the eight ILCs’ service areas.

Chart 1: Consumers by Age, 2016-2019

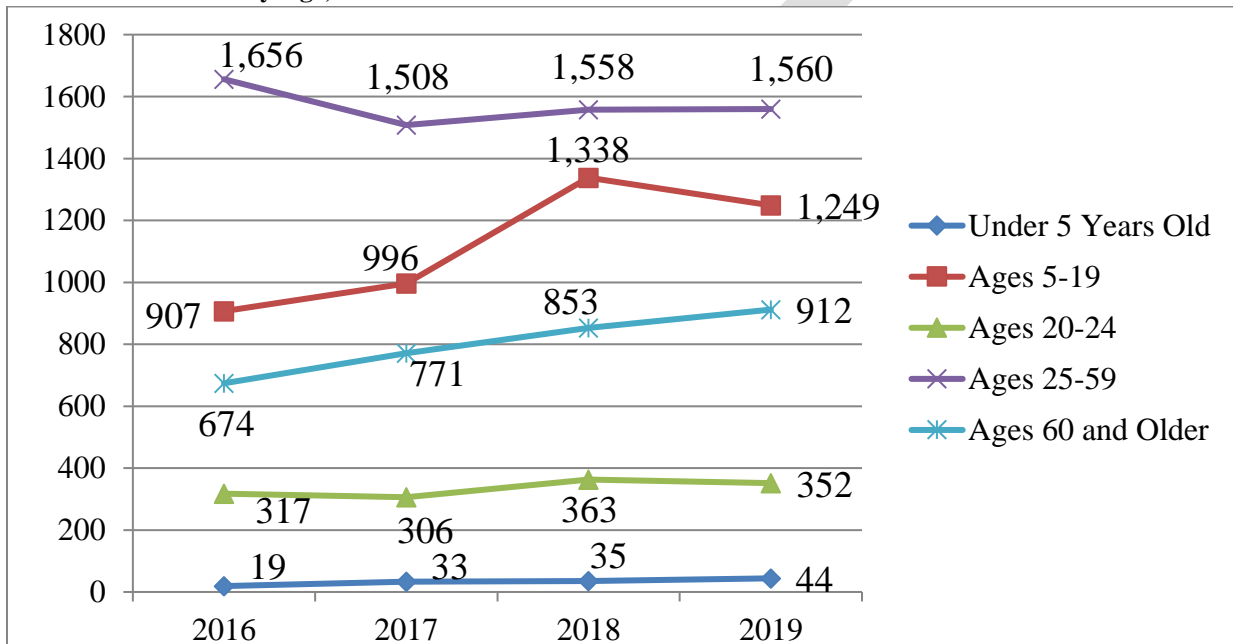


Chart 2: Consumers Served by Age, 2019

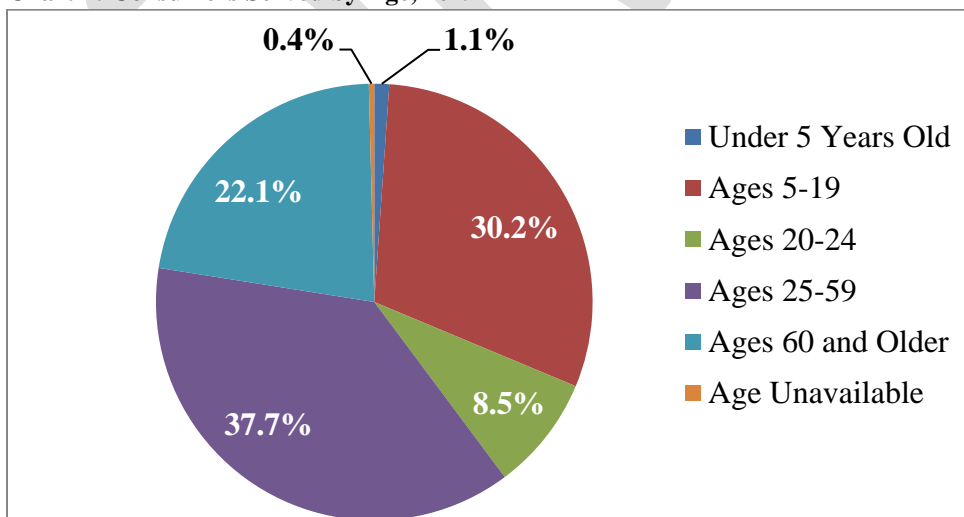
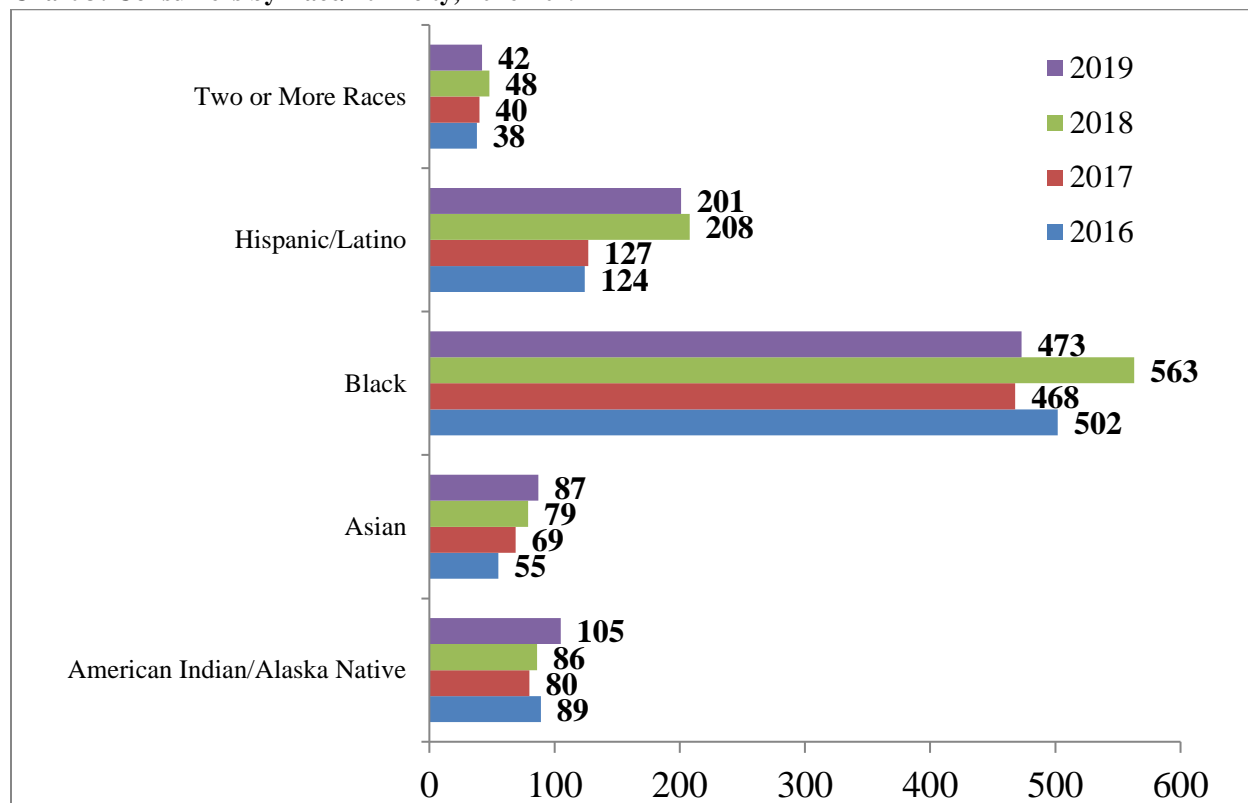
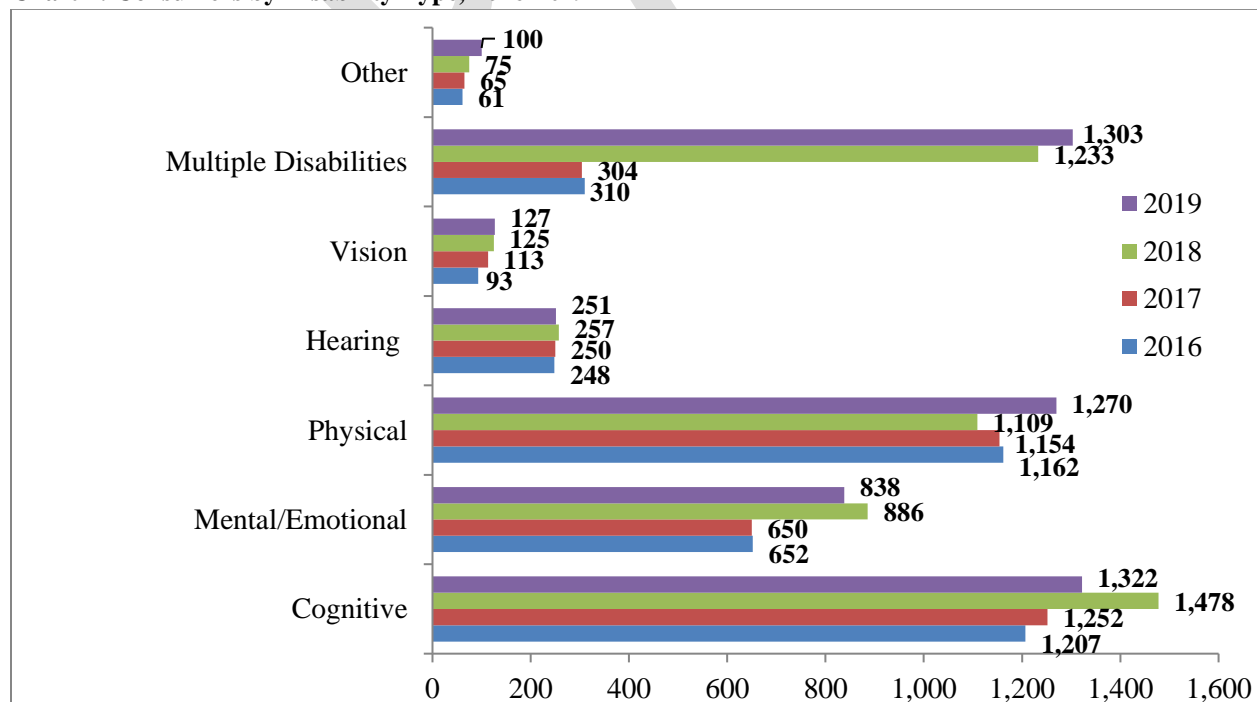


Chart 3: Consumers by Race/Ethnicity, 2016-2019



Note: Native Hawaiian or Other Pacific Islander was less than 10 people a year, left off chart as it skewed data on chart. White people were also listed on separate chart for this reason.

Chart 4: Consumers by Disability Type, 2016-2019



Yet consumers in virtually every part of the state and across all population segments are “underserved”, meaning we are not reaching the majority of them. With the current resources ILCs receive, the Network is able to provide IL services to 1% of the total number of people with disabilities in 54 of Wisconsin’s 72 counties. In addition, as noted in the charts above, Wisconsin currently assess the following three population segment data sets (age, race/ethnicity, and type of disability) to determine “most underserved”. Wisconsin will be reviewing and revising the methodology to ascertain “most underserved” over the next three years of the new SPIL. We also are planning to use this new data analysis to determine funding equity of the current eight ILCs’ service areas.

The ILCs of Wisconsin report data to Wisconsin SILC no less than once annually to calculate any underserved populations, and Wisconsin SILC will compile the data to identify underserved trends. As previously stated, over the next three years, Wisconsin will review and potentially revise if using the current four target populations (age, race/ethnicity, type of disability, geographic location) is the best methodology to determine “most underserved”.

ILCs will consider strategies for their outreach once the new target areas are determined that could include the following:

- Make brochures and other information in English, alternate formats and high-concentration foreign languages such as Spanish and Hmong to consumers directly and through county officials, disability organizations, refugee assistance organizations, and other local contacts in underserved counties or areas with other underserved groups.
- Communicate and provide culturally appropriate services for underserved groups.
- Update outreach plans to take advantage of new communication technologies.
- Advertise in media serving communities identified as most underserved.
- Work with community organizations serving the most underserved populations.
- Open and support an office in an underserved county to coordinate work with consumers and others in that area.
- Recruit Board and staff members from underserved populations.

2.3 Coordination

Plans for coordination of services and cooperation among programs and organizations that support community life for persons with disabilities.

Wisconsin SILC meets at least quarterly and as needed, to maximize the cooperation and coordination of roles and responsibilities with respect to the IL programs. The DSE has appointed a representative who attends quarterly Wisconsin SILC Council meetings. The representative or another member of the DSE staff update the Council on DSE services as a regular agenda item at Council meetings. An ILC Executive Director, elected by the ILCs and appointed by the Governor as the IL Representative, reports on the operations and activities of WCILC and the ILCs at the Council’s quarterly meetings.

Wisconsin SILC, WCILC, and ILCs coordinate trainings, where feasible, to avoid duplication when training may be useful to board members, SILC members, or staff of more than one entity within the program. The WCILC, Wisconsin SILC, and DSE staff meet periodically, as needed, to exchange information about implementation of the SPIL and promote cooperation and coordination of their roles with respect to the IL services.

The Wisconsin IL Network maintains contact and/or receives updates with several disability councils and other organizations to solicit input for development, implementing, monitoring, and evaluation of the SPIL. These include the following:

- Wisconsin Rehabilitation Council – Wisconsin SILC representative participates and attends quarterly meetings.
- Statewide Assistive Technology Advisory Council – ILC representative participates and attends quarterly meetings.
- Governor's Committee for People with Disabilities (GCPD) – WCILC staff is appointed to the Committee and attends quarterly meetings.
 - GCPD includes representatives from the following Governor or Secretary appointed Councils:
 - Wisconsin Board for People with Developmental Disabilities (BPDD)
 - Wisconsin Council on Physical Disabilities
 - Wisconsin Council on Mental Health
 - Wisconsin State Council on Alcohol & Other Drug Abuse
 - Wisconsin Statutory Council on Blindness
 - Wisconsin Council for the Deaf and Hard of Hearing
- Survival Coalition (Coalition of 30 plus disability organizations) – WCILC is a member and WCILC staff attends bi-weekly meetings.
- National Council on Independent Living (NCIL) – WCILC staff is a Board Member, Region V Representative and attends meetings four times a year. The Wisconsin IL Network has several members who participate in various NCIL Committees, which usually meet monthly.
- Association of Rural Programs for Independent Living (APRIL) – The majority of Wisconsin ILCs as APRIL members and the Wisconsin IL Network has a representative on the APRIL board.

WILN has a three year Disability Systems Advocacy Plan that is developed based on consumer and stakeholder input. Members from WCILC, Wisconsin SILC, and ILCs all participate in the development of the Wisconsin IL Network's Disability System Advocacy Plan. The plan has individual issue teams that meet monthly. These teams receive and provide input on the advocacy plan's priority areas. The teams develop a unified voice/message around each issue. This unified voice is shared with other disability councils, committees, and policymakers. The Wisconsin IL Network representatives on the various disability committees provide input and receive information and then, in turn, impart that information back to the IL Network Committees. This circular system of information in and information back out is effective in achieving a cohesive and informed IL Network in Wisconsin that we are very proud of. This information is shared on a continual basis with staff, board, and consumers of the eight ILCs,

WCILC, and the Wisconsin SILC. The Wisconsin IL Network addresses state and national issues and local and regional issues are addressed by the ILCs. Wisconsin's IL Network has representation on over forty-five state and national disability committees.

Section 3: Network of Centers

3.1 Existing Centers

Current Centers for Independent Living including: legal name; geographic area and counties served; and source(s) of funding. Oversight process, by source of funds (e.g., Part B, Part C, state funds, etc.) and oversight entity.

| Independent Living Center | Geographic Area | Counties | Source(s) of Funding | Oversight Entity |
|---|------------------------|--|---|--|
| Access to Independent Living | Madison Metro Area | Columbia, Dane, Dodge, Green | Part B, Part C, State Independent Living General Purpose Revenue, Social Security Reimbursement Funds | Part C and CARES Act – ACL/OLIP All other funds – DSE |
| Center for Independent Living for Western Wisconsin | West Central Wisconsin | Polk, Barron, Rusk, St. Croix, Dunn, Chippewa, Pierce, Pippin, Eau Claire, Clark | Part B, Part C, State Independent Living General Purpose Revenue, Social Security Reimbursement Funds | Part C and CARES Act – ACL/OLIP All other funds – DSE |
| Independence First | Milwaukee Metro Area | Milwaukee, Washington, Waukesha, Ozaukee | Part B, Part C, State Independent Living General Purpose Revenue, Social Security Reimbursement Funds | Part C and CARES Act – ACL/OLIP All other funds – DSE |
| Independent Living Resources | Southwestern Wisconsin | Crawford, Richland, Sauk, Iowa, Grant, Lafayette, Vernon, La Crosse, Monroe, Jackson, Trempealeau, Buffalo, Juneau | Part B, Part C, State Independent Living General Purpose Revenue, Social Security Reimbursement Funds | Part C and CARES Act – ACL/OLIP All other funds – DSE |
| Midstate Independent Living Choices | Central Wisconsin | Adams, Florence, Forest, Langlade, Lincoln, Marathon, Oneida, Portage, | Part B, Part C, State Independent Living General Purpose Revenue, Social Security Reimbursement Funds | Part C and CARES Act – ACL/OLIP All other funds – DSE |

| Independent Living Center | Geographic Area | Counties | Source(s) of Funding | Oversight Entity |
|----------------------------------|---------------------|--|---|--|
| | | Taylor, Vilas, Wood | | |
| North Country Independent Living | Northwest Wisconsin | Douglas, Bayfield, Ashland, Iron, Price, Sawyer, Washburn, Burnett | Part B, Part C, State Independent Living General Purpose Revenue, Social Security Reimbursement Funds | Part C and CARES Act – ACL/OLIP All other funds – DSE |
| Options for Independent Living | Northeast Wisconsin | Door, Kewaunee, Manitowoc, Brown, Sheboygan, Fond du Lac, Calumet, Green Lake, Marquette, Winnebago, Waupaca, Waushara, Outagamie, Shawano, Menominee, Marinette, Oconto | Part B, Part C, State Independent Living General Purpose Revenue, Social Security Reimbursement Funds | Part C and CARES Act – ACL/OLIP All other funds – DSE |
| Society's Assets Incorporated | Southeast Wisconsin | Jefferson, Kenosha, Racine, Rock, Walworth | Part B, Part C, State Independent Living General Purpose Revenue, Social Security Reimbursement Funds | Part C and CARES Act – ACL/OLIP All other funds – DSE |

Part B, Independent Living General Purpose Revenue, Social Security Reimbursement Funds are overseen by the DSE. The DSE has a Memorandum of Understanding with Division of Vocational Rehabilitation for Social Security Reimbursement Funds which are pass-through dollars allocated to the Independent Living Centers (ILCs).

ILCs receive two grant continuation packets one on a State Fiscal Year Basis and one on a Federal Fiscal Year basis. ILCs complete the budget requests and submit to DSE. DSE reviews for allowable costs and approves budgets. Contracts are issued for these funds to each ILC. ILC completes lobbying certification and non-discrimination and conflict of interest documentation as part of their state contracts. ILCs submit copies of the annual Program Performance Reports to DSE, Wisconsin SILC, and ACL/OILP. In addition, ILCs report quarterly on program data and year-to-date budget spending by funding source. ILCs also submit their annual financial audits to DSE.

Part C funds and CARES Act funds and related reporting are overseen ACL/OILP.

3.2 Expansion and Adjustment of Network

Plan and priorities for use of funds, by funding source, including Part B funds, Part C funds, State funds, and other funds, whether current, increased, or one-time funding and methodology for distribution of funds. Use of funds to build capacity of existing Centers, establish new Centers, and/or increase statewideness of Network. Minimum funding level for a Center and formula/plan for distribution of funds to bring each Center to the minimum. Exceptions must be explained with sufficient detail. Action/process for distribution of funds relinquished or removed from a Center and/or if a Center closes. Plan/formula for adjusting distribution of funds when cut/reduced. Plan for changes to Center service areas and/or funding levels to accommodate expansion and/or adjustment of the Network. Plan for one-time funding and/or temporary changes to Center service areas and/or funding levels.

By 1994, Wisconsin resolved to provide IL services in every county of the State and the Legislature appropriated funds to do so. In 2002, Rehabilitation Services Administration made Title VII, Chapter 1, Part C funds available pursuant to the SPIL to serve all areas and populations that had been unserved by a federally-funded ILC at the time.

These funds and additional funds appropriated since then have never been sufficient to serve every consumer who needs IL services, let alone others who could benefit from IL services in Wisconsin. Thus, service information shows that our network underserves virtually every county in the State at existing funding levels. All 72 counties in Wisconsin are served, meaning they have at least one consumer receiving IL services. Yet, we believe all 72 counties are underserved for a variety of reasons, including the lack of base funds to provide services to all people with disabilities living in each of Wisconsin's 72 counties.

The Wisconsin SILC, ILCs, and DSE have thoroughly analyzed service data throughout the term of the prior State Plan. We find that no part of the State or any significant population segment is unserved. Yet consumers in virtually every part of the State and across all population segments are underserved.

The WILN and the DSE will work together over the next three years to determine the criteria and statistical analysis needed to determine the "most underserved" areas of the state.

We value the importance of input from the ILCs and the Wisconsin SILC in making decisions regarding funding at both the state and federal level. We also recognize the importance of implementing our long-standing policy regarding funding equity within the Network of Centers. Note, we use the term "base funds" to refer to funds appropriated under federal and state law to provide general support for the operation of Centers for Independent Living and independent living services when those funds are generally expected to be available from year-to-year. We include as base funds, those authorized under the Rehabilitation Act of 1973, as amended, Title VII, Chapter 1, subchapter C and Social Security Reimbursement funds, and under sec.46.96(2), Wis. Stats.

The SILC Resource Plan funds totaling \$161,783 is allocated to the Wisconsin SILC. Funding is for the Resource Plan and to evaluate and meet SPIL goals.

The \$65,000 is allocated to WCILC for SPIL reporting and to meet SPIL goals.

The IL Services and General CIL Operations is allocated amongst Wisconsin's eight ILCs. ILCs receive Part C funds directly. The DSE allocates Part B, Independent Living State General Purpose Revenue, and Social Security Act funds to the ILCs based on Section 3.1 of the SPIL (see chart below).

| Agency | Funding Source/Program: Part B (amount includes federal & state match) | Funding Source/Program: State IL GPR | Funding Source/Program: Social Security Reimbursement | Funding Source/Program: I&E | TOTAL Award (all funding sources) |
|------------------------|---|---|--|--|--|
| Access to Independence | \$21,562 | \$44,395 | \$27,085 | | \$93,042 |
| Society's Assets | \$21,562 | \$182,682 | \$111,448 | | \$315,692 |
| Independence First | \$21,562 | \$19,483 | \$11,887 | | \$52,932 |
| North Country IL | \$21,562 | \$182,682 | \$111,448 | | \$315,692 |
| CILWW | \$21,562 | \$6,212 | \$3,788 | | \$31,562 |
| ILR | \$21,562 | \$182,682 | \$111,448 | | \$315,692 |
| Options | \$21,562 | \$182,682 | \$111,448 | | \$315,692 |
| Mid-State | \$21,562 | \$182,682 | \$111,448 | | \$315,692 |
| WCILC | \$65,000 | | | | \$65,000 |
| SILC (ILCW) | \$101,783 | | | \$60,000 | \$161,783 |
| TOTAL | \$339,279 | \$983,500 | \$600,000 | \$60,000 | \$1,982,779 |

A strong network serves to increase access to services for people with disabilities. Adherence to our funding equity policy keeps the network strong. The fundamental aspect of our funding equity policy is that all ILCs go up or down together. Equity in funding increases or decreases in a given year occurs when the difference between the "base funds" for that year and for the prior year are essentially equal for each ILC. All 72 counties in Wisconsin are within an ILC's service area and there are no current proposed changes to the 8 ILCs' service areas, although that is something we may explore together in the future.

WILN will prioritize new (non-one-time funding) based on the following three priorities, in order, for when new funds (beyond the cost-of-living increase) are available:

- 1. Maintain the ability of each ILC in the existing Network to serve its consumers at 2008 funding levels (levels received for the performance period from October 2007 through September 2008).** Federal Fiscal Year 2008 was the chosen baseline because at the time it was the high-water mark for all of the ILCs, including the five that were now receiving federal funds, and had increases or steady funding from one year to the next, and all of the ILCs had achieved our previous base funding target of \$300,000.
- 2. Support existing ILCs and achieve \$580,000 base funding target per ILC; and**
- 3. Provide additional resources to support IL services in the most underserved service area** using the methodology determined by the Wisconsin IL Network during the next three years.

Other aspects of our funding equity policy restrict application of new funds to start a new ILC when that might endanger funding to the existing Network of Centers and/or be unsustainable for a new ILC. An appropriation providing new funds should not cause funding a new ILC the funding is expected to continue from year-to-year indefinitely. Nor should a new ILC be started until all ILC in the existing Network receive at least our "base funding target," currently \$580,000 in base funds. We have determined this figure to reflect the cost to operate an ILC at a fully compliant level that we believe all ILCs should meet.

Funding Priorities Note: The methodology employed to adhere to the principle of Priority 1 and 2 above since 2003 has been to use the non-federal base funds appropriations to provide centers with a proportionate increase in that year that is as equitable across the network as is practicable. All centers in the network receive "base fund" contracts described earlier. Historically, however, some centers in the network established at an earlier time (1979-80) receive a much larger subchapter C award than centers formed later funded primarily by state statute 46.96. With the full concurrence of the entire IL network including the DHS/DSE that also serves as the administrator of the state funds, those centers founded later receive a larger state base funding contract relative to those centers which hold a larger subchapter C award. Therefore, when the IL network is in receipt of a letter from the Administrator that new non one-time federal funds beyond COLA are available in any given year and asking how the network wishes to distribute those funds in line with the current approved SPIL, it the process described above that is used. The state based funds contracts are modified in an attempt to level out the impact of the increases and decreases so as not to exacerbate the historical imbalance in base funds available for all centers to carry out the requirements of a CIL contained in state and federal law.

Section 4: Designated State Entity

Wisconsin Department of Health Services, Division of Public Health, Bureau of Aging and Disability Resources will serve as the entity in _____ Wisconsin _____ designated to receive, administer, and account for funds made available to the state under Title VII, Chapter 1, Part B of the Act on behalf of the State. (*Sec. 704(c)*)

4.1 DSE Responsibilities

- (1) receive, account for, and disburse funds received by the State under this chapter based on the plan;
- (2) provide administrative support services for a program under Part B, and a program under Part C in a case in which the program is administered by the State under section 723;
- (3) keep such records and afford such access to such records as the Administrator finds to be necessary with respect to the programs;
- (4) submit such additional information or provide such assurances as the Administrator may require with respect to the programs; and
- (5) retain not more than 5 percent of the funds received by the State for any fiscal year under Part B. for the performance of the services outlined in paragraphs (1) through (4).

4.2 Grant Process & Distribution of Funds

Grant processes, policies, and procedures to be followed by the DSE in the awarding of grants of Part B funds.

The DSE issues funds to the ILCs, WCILC, and SILC as outlined in the State Plan for Independent Living Financial Plan. The DSE allocates I&E, Part B funds, and Part B match funds on a federal fiscal year basis (October 1 – September 30). The DSE allocates the Social Security Reimbursement and state general purpose revenue on a state fiscal year basis (July 1 – June 30). Prior to receiving these funds and related contracts the DSE will issue grant continuation packets to be completed by the SILC, WCILC, and ILCs. The grant continuation packet is issued 60 days prior to the start of the fiscal year. The grant continuation packets include a budget form to be completed, scope of work, and quarterly program and budget reports. The grant packets are due to the DSE 30 days prior to the start of the fiscal year. Grant funds are available at the start of the fiscal year and are available to draw upon on a monthly basis.

The Independent Living Centers receive Part C funds and CARES Act funds directly from the federal government.

4.3 Oversight Process for Part B Funds

The oversight process to be followed by the DSE.

The Independent Living Centers will submit a Part B program and budget report on a quarterly basis. THE ILCs and SILC will submit copies of their annual Program Performance Report to the DSE. The ILCs, WCILC, and SILC submit copies of their annual financial audits to the DSE.

4.4 Administration and Staffing

Administrative and staffing support provided by the DSE.

The DSE will carry out the roles and responsibilities as outlined in the assurances. The DSE will also provide additional administrative support as requested by the SILC through a MOA between the SILC and DSE.

4.5 State Imposed Requirements

State-imposed requirements contained in the provisions of this SPIL including: (45 CFR 1329.17(g))

- State law, regulation, rule, or policy relating to the DSE's administration or operation of IL programs
- Rule or policy implementing any Federal law, regulation, or guideline that is beyond what would be required to comply with 45 CFR 1329
- That limits, expands, or alters requirements for the SPIL

4.6 722 vs. 723 State

Check one:

☒ 722 (if checked, will move to Section 5)
☐ 723 (if checked, will move to Section 4.7)

4.7 723 States

Order of priorities for allocating funds amounts to Centers, agreed upon by the SILC and Centers, and any differences from 45 CFR 1329.21 & 1329.22.

How state policies, practices, and procedures governing the awarding of grants to Centers and oversight of the Centers are consistent with 45 CFR 1329.5, 1329.6, & 1329.22.

Section 5: Statewide Independent Living Council (SILC)

5.1 Establishment of SILC

How the SILC is established and SILC autonomy is assured.

Establishment and Placement

The Wisconsin SILC is incorporated as the Independent Living Council of Wisconsin and is a 501(c)(3) organization with a central office is located in Madison, Wisconsin.

Autonomy

The Wisconsin SILC is allocated 30% in Part B funds (\$101,783) and I&E funds (\$60,000) for a total budget of \$161,783. The DSE issues a grant continuation packet on a federal fiscal year. The budget is developed by the Wisconsin SILC Treasurer and Wisconsin SILC Staff. The budget is then distributed and reviewed by the entire SILC. After review and revision as applicable, the Wisconsin SILC will vote on the approval of the budget. At all Wisconsin SILC meetings the full Council receives monthly financial statements, as well as a review of budget to actual expenditures.

The Wisconsin SILC maintains autonomy and control of its budget, the DSE provides fiscal oversight and monitoring. Annually the Wisconsin SILC submits a budget to the DSE for approval to ensure fiscal oversight and accountability. Any input or suggestions from the DSE are only to assist in Wisconsin SILC's compliance with state and federal laws.

There are no conditions or requirements that are imposed by the DSE or any other entity that may compromise the independence of the Wisconsin SILC. The Wisconsin SILC and the DSE work hard to maintain the independence of the Wisconsin SILC by not having language in grant award agreements that may inadvertently compromise the Wisconsin SILC's autonomy.

The Wisconsin SILC has implemented comprehensive fiscal policies and procedures to ensure proper internal controls and fiscal accountability.

Several processes are in place to ensure proper internal financial controls are in place including the SILC Treasurer reviewing each month's bank statements, check signing limitations, an annual independent financial audit, and monthly grant claims and quarterly program reports submitted to the DSE.

5.2 SILC Resource plan

Resources (including necessary and sufficient funding, staff/administrative support, and in-kind), by funding source and amount, for SILC to fulfill all duties and authorities. Process used to develop the Resource Plan. Process for disbursement of funds to facilitate effective operations of SILC. Justification if more than 30% of the Part B appropriation is to be used for the SILC Resource Plan.

The resource plan was prepared by the Wisconsin SILC in partnership with the IL Network. The resource plan is based on the Network of Centers funding equity principles.

The DSE issues funds to the ILCs, WCILC, and SILC as outlined in the SPIL Financial Plan. The DSE allocates I&E, Part B funds, and Part B match funds on a federal fiscal year basis (October 1 – September 30). The DSE allocates the Social Security Reimbursement and state general purpose revenue on a state fiscal year basis (July 1 – June 30). Prior to receiving these funds and related contracts the DSE will issue grant continuation packets to be completed by the SILC, WCILC, and ILCs. The grant continuation packet is issued 60 days prior to the start of the fiscal year. The grant continuation packets include a budget form to be completed, scope of work, and quarterly program and budget reports. The grant packets are due to the DSE 30 days prior to the start of the fiscal year. Grant funds are available at the start of the fiscal year and are available to draw upon on a monthly basis.

The Independent Living Centers receive Part C funds and CARES Act funds directly from the federal government.

\$34,200 is provided in state general purpose revenue is associated with state match. In addition, the DSE staff is also provided as state match. The DSE does not retain any federal Part B funds and staff positions are 100% funded with state general purpose revenue.

The SILC Resource Plan funds totaling \$161,783 is allocated to the Wisconsin SILC. Funding is for the Resource Plan and to evaluate and meet SPIL goals.

The \$65,000 is allocated to WCILC for SPIL reporting and to meet SPIL goals.

The IL Services and General CIL Operations is allocated amongst Wisconsin's eight ILCs. ILCs receive Part C funds directly. The DSE allocates Part B, Independent Living State General Purpose Revenue, and Social Security Act funds to the ILCs based on Section 3.1 of the SPIL (see chart below).

| Agency | Funding Source/Program: Part B (amount includes federal & state match) | Funding Source/Program: State IL GPR | Funding Source/Program: Social Security Reimbursement | Funding Source/Program: I&E | TOTAL Award (all funding sources) |
|------------------------|---|---|--|--|--|
| Access to Independence | \$21,562 | \$44,395 | \$27,085 | | \$93,042 |
| Society's Assets | \$21,562 | \$182,682 | \$111,448 | | \$315,692 |
| Independence First | \$21,562 | \$19,483 | \$11,887 | | \$52,932 |
| North Country IL | \$21,562 | \$182,682 | \$111,448 | | \$315,692 |
| CILWW | \$21,562 | \$6,212 | \$3,788 | | \$31,562 |
| ILR | \$21,562 | \$182,682 | \$111,448 | | \$315,692 |
| Options | \$21,562 | \$182,682 | \$111,448 | | \$315,692 |
| Mid-State | \$21,562 | \$182,682 | \$111,448 | | \$315,692 |
| WCILC | \$65,000 | | | | \$65,000 |
| Wisconsin SILC | \$101,783 | | | \$60,000 | \$161,783 |
| TOTAL | \$339,279 | \$983,500 | \$600,000 | \$60,000 | \$1,982,779 |

If a situation occurs that all of the awarded Subchapter B funds are not expended, the decision on the use of those funds in the next fiscal year is made by the Wisconsin SILC. If retained by Wisconsin SILC, it will be used toward activities which will benefit the IL Network. Any changes to the budget that require a SPIL amendment will also be approved by no less than 51% of the ILCs.

The resource plan supports all management and operation of the SILC including, but not limited to, staffing, office administration cost, operational costs, contractual services, board training and development, staff training and development, travel both in and out of state for staff and board, assisting the IL Network, any reasonable accommodations for board, staff, or the public.

The resource plan will ensure the SILC's ability to perform the duties and authorities of SILC:

(1) Duties. – The Council shall

(A) develop the State plan as provided in section 704(a)(2);

(B) monitor, review, and evaluate the implementation of the State plan;

(C) meet regularly, and ensure that such meetings of the Council are open to the public and sufficient advance notice of such meetings is provided;

(D) submit to the Administrator such periodic reports as the Administrator may reasonably request, and keep such records, and afford such access to such records, as the Administrator finds necessary to verify the information in such reports; and

(E) as appropriate, coordinate activities with other entities in the State that provide services similar to or complimentary to independent living services, such as entities that facilitate the provision of or provide long-term community-based services and supports.

(2) Authorities. – The Council may, consistent with the State plan described in section 704, unless prohibited by State law –

(A) in order to improve services provided to individuals with disabilities, work with Centers for Independent Living to coordinate services with public and private entities as part of the IL Network and toward the goals and objectives including the IL Network;

(B) conduct resource development activities to support the activities described in this subsection or to collaborate and support the provision of Independent Living services by Centers for Independent Living; SILC will participate in the goals and objectives outlined in the Plan to support the SILC and the Centers for Independent Living.

(C) perform such other functions, consistent with the purpose of this chapter and comparable to other functions described in this subsection, as the Council determines to be appropriate.

All funds included in the plan are based upon prior years of financial information and commitment from the DSE, subject to state appropriation amounts. Should changes in appropriations occur, the SILC in consultation with the DSE, will develop a plan to address the changes in the SILC resource plan.

A cost analysis detailing the actual costs of maintaining and operating the Wisconsin SILC will be conducted semi-annually.

5.3 Maintenance of SILC

How State will maintain SILC over the course of the SPIL.¹

Recruitment and Appointing Authority

The Wisconsin SILC recruits potential members through marketing materials made available via email, hard copy, newsletters, and on its website. These recruitment materials are shared with ILCs, WCILC, and the Governor's office. Wisconsin SILC communicates membership needs to the Governor's office and Wisconsin Independent Living Network to recruit qualified members that meet the Council's needs. Factors considered in the recruitment of new members include skills, knowledge, abilities, and current SILC vacancies and needs. The Wisconsin SILC also seeks to recruit members who are representative underserved populations or geographic regions of the state as identified in the SPIL. The Wisconsin SILC is responsible for informing the Governor's appointment staff of federally mandated requirements for SILC membership and compliance. Members of the SILC are appointed by the Governor's Office.

Individuals interested in serving on the Wisconsin SILC must apply through the Governor's website or by contacting the Governor's appointment staff and requesting a reasonable accommodation, if the person is unable to utilize the website to apply to serve. Once the applicant has submitted the required documentation, the Governor's Office will complete a

background check and will then forward the applicant's information and documentation to the Wisconsin SILC Chair.

The Wisconsin SILC Chair will interview, via phone, in-person, or using alternative communication technology, with the prospective SILC member to gather information about applicant's fitness and commitment to serve on the SILC and to assess their basic knowledge of the Independent Living Movement. The completed interview documentation and application documents will be sent to the entire Wisconsin SILC for review and approval.

Once the interview is complete the prospective member will be required to attend either a quarterly meeting or an Executive Committee meeting. At either meeting, SILC members and the prospective applicant will have an opportunity to ask questions of one another.

After prospective applicant attends a meeting the entire Council will vote to either approve or disapprove the applicant's appointment to the SILC. The SILC Chair, Membership Committee Chair, or Program Coordinator will then send a letter to the Governor's Office stating either a recommendation to appoint applicant to the SILC or a recommendation to not appoint applicant to the SILC for a given reason. At this point, the Governor's Office is then responsible for sending the forms and documentation to finalize the appointment process to the SILC.

The Chair of the SILC is elected to a two-year term by the full SILC. In the event that the Chair has to vacate his or her position prematurely, the Vice-Chair will assume the powers and function of the Chair until the next scheduled election of Officers.

Staffing of SILC

The SILC Program Coordinator, consistent with federal and state laws, is supervised by the SILC Chair and Vice Chair. Furthermore, the SILC Program Coordinator will be evaluated by Wisconsin SILC per the staff evaluation schedule in accordance with the approved SILC personnel policies. Personnel policies of SILC are approved and reviewed periodically by the SILC.

SILC Operations

The SILC operates in following the following approved policies that ensure that SILC has the autonomy to operate and conduct its required duties and the granted authorities:

- By-laws;
- Member Policies and Procedures;
- Fiscal Policies and Procedures;
- Personnel Policies;
- SILC Member Training;
- DSE allocates resources as directed by the SILC in the Resource Plan Section of the SPIL; and
- Memorandum of Understanding (MOU) with DSE for administrative support, as needed.

The SILC has been able to maintain necessary and sufficient resources to ensure capacity to fulfill its statutory duties and authorities by requesting administrative support from the DSE as needed, and as outlined in the MOU to ensure SILC functioning. The DSE provides administrative support as requested at no-cost to the Wisconsin SILC.

Section 6: Legal Basis and Certifications

6.1 Designated State Entity (DSE)

The state entity/agency designated to receive and distribute funding, as directed by the SPIL, under Title VII, Part B of the Act is Wisconsin Department of Health Services, Division of Public Health, Bureau of Aging and Disability Resources.

Authorized representative of the DSE Carrie Molke Title Bureau Director.

6.2 Statewide Independent Living Council (SILC)

The Statewide Independent Living Council (SILC) that meets the requirements of section 705 of the Act and is authorized to perform the functions outlined in section 705(c) of the Act in the State is Independent Living Council of Wisconsin.

6.3 Centers for Independent Living (CILs)

The Centers for Independent Living (CILs) eligible to sign the SPIL, a minimum of 51% whom must sign prior to submission, are:

Access to Independent Living
Center for Independent Living for Western Wisconsin
Independence First
Independent Living Resources
Midstate Independent Living Choices
North Country Independent Living
Options for Independent Living
Society's Assets, Incorporated

6.4 Authorizations

6.4.a. The SILC is authorized to submit the SPIL to the Independent Living Administration, Administration for Community Living. Yes_ (Yes/No)

6.4.b. The SILC and CILs may legally carryout each provision of the SPIL. Yes (Yes/No)

6.4.c. State/DSE operation and administration of the program is authorized by the SPIL. Yes (Yes/No)

Section 7: DSE Assurances

Carrie Molke acting on behalf of the DSE Wisconsin Department of Health Services, Division of Public Health, Bureau of Aging and Disability Resources located at 1 W. Wilson St, Room 551, Madison, WI 53701, 608- 267-5267, Carrie.Molke@dhs.wisconsin.gov
45 CFR 1329.11 assures that:

- 7.1. The DSE acknowledges its role on behalf of the State, as the fiscal intermediary to receive, account for, and disburse funds received by the State to support Independent Living Services in the State based on the plan;
- 7.2. The DSE will assure that the agency keeps appropriate records, in accordance with federal and state law, and provides access to records by the federal funding agency upon request;
- 7.3. The DSE will not retain more than 5 percent of the funds received by the State for any fiscal year under Part B for administrative expenses;¹
- 7.4. The DSE assures that the SILC is established as an autonomous entity within the State as required in *45 CFR 1329.14*;
- 7.5. The DSE will not interfere with the business or operations of the SILC that include but are not limited to:
 1. Expenditure of federal funds
 2. Meeting schedules and agendas
 3. SILC board business
 4. Voting actions of the SILC board
 5. Personnel actions
 6. Allowable travel
 7. Trainings
- 7.6. The DSE will abide by SILC determination of whether the SILC wants to utilize DSE staff:
 1. If the SILC informs the DSE that the SILC wants to utilize DSE staff, the DSE assures that management of such staff with regard to activities and functions performed for the SILC is the sole responsibility of the SILC in accordance with Sec. 705(e)(3) of the Act (Sec. 705(e)(3), 29 U.S.C. 796d(e)(3)).
- 7.7. The DSE will fully cooperate with the SILC in the nomination and appointment process for the SILC in the State;
- 7.8. The DSE shall make timely and prompt payments to Part B funded SILCs and CILs:
 1. When the reimbursement method is used, the DSE must make a payment within 30 calendar days after receipt of the billing, unless the agency or pass-through entity reasonably believes the request to be improper;
 2. When necessary, the DSE will advance payments to Part B funded SILCs and CILs to cover its estimated disbursement needs for an initial period generally geared to the mutually agreed upon disbursing cycle; and
 3. The DSE will accept requests for advance payments and reimbursements at least monthly when electronic fund transfers are not used, and as often as necessary when electronic fund transfers are used, in accordance with the provisions of the Electronic Fund Transfer Act (15 U.S.C. 1693-1693r).

The signature below indicates this entity/agency's agreement to: serve as the DSE and fulfill all the responsibilities in Sec. 704(c) of the Act; affirm the State will comply with the aforementioned assurances during the three-year period of this SPIL; and develop, with the SILC, and ensure that the SILC resource plan is necessary and sufficient (in compliance with section 8, indicator (6) below) for the SILC to fulfill its statutory duties and authorities under Sec. 705(c) of the Act, consistent with the approved SPIL.¹

Carrie Molke, Bureau Director
Name and Title of DSE director/authorized representative

Signature Date

Electronic signature may be used for the purposes of submission, but hard copy of signature must be kept on file by the SILC.

Section 8: Statewide Independent Living Council (SILC) Assurances and Indicators of Minimum Compliance

8.1 Assurances

Jerry McCloskey acting on behalf of the SILC Independent Living Council of Wisconsin located at 3810 Milwaukee St., Madison, WI 53714, 608-575-9293, gimp0421@yahoo.com 45 CFR 1329.14 assures that:

- (1) The SILC regularly (not less than annually) provides the appointing authority recommendations for eligible appointments;
- (2) The SILC is composed of the requisite members set forth in the Act;¹
- (3) The SILC terms of appointment adhere to the Act;¹
- (4) The SILC is not established as an entity within a State agency in accordance with 45 CFR Sec. 1329.14(b);
- (5) The SILC will make the determination of whether it wants to utilize DSE staff to carry out the functions of the SILC;
 - a. The SILC must inform the DSE if it chooses to utilize DSE staff;
 - b. The SILC assumes management and responsibility of such staff with regard to activities and functions performed for the SILC in accordance with the Act.¹
- (6) The SILC shall ensure all program activities are accessible to people with disabilities;
- (7) The State Plan shall provide assurances that the designated State entity, any other agency, office, or entity of the State will not interfere with operations of the SILC, except as provided by law and regulation and;
- (8) The SILC actively consults with unserved and underserved populations in urban and rural areas that include, indigenous populations as appropriate for State Plan development as described in Sec. 713(b)(7) the Act regarding Authorized Uses of Funds.¹

Section 8.2 Indicators of Minimum Compliance

Indicators of minimum compliance for Statewide Independent Living Councils (SILC) as required by the Rehabilitation Act (Section 706(b), 29 U.S.C. Sec 796d-1(b)), as amended and supported by 45 CFR 1329.14-1329.16; and Assurances for Designated State Entities (DSE) as permitted by Section 704(c)(4) of the Rehabilitation Act (29 U.S.C. Sec. 796c(c)(4)), as amended.

(a) STATEWIDE INDEPENDENT LIVING COUNCIL INDICATORS. –

(1) SILC written policies and procedures must include:

- a. A method for recruiting members, reviewing applications, and regularly providing recommendations for eligible appointments to the appointing authority;
- b. A method for identifying and resolving actual or potential disputes and conflicts of interest that are in compliance with State and federal law;
- c. A process to hold public meetings and meet regularly as prescribed in 45 CFR 1329.15(a)(3);
- d. A process and timelines for advance notice to the public of SILC meetings in compliance with State and federal law and 45 CFR 1329.15(a)(3);
- e. A process and timeline for advance notice to the public for SILC “Executive Session” meetings, that are closed to the public, that follow applicable federal and State laws;
 - i. “Executive Session” meetings should be rare and only take place to discuss confidential SILC issues such as but not limited to staffing.
 - ii. Agendas for “Executive Session” meetings must be made available to the public, although personal identifiable information regarding SILC staff shall not be included;
- f. A process and timelines for the public to request reasonable accommodations to participate during a public Council meeting;
- g. A method for developing, seeking and incorporating public input into, monitoring, reviewing and evaluating implementation of the State Plan as required in 45 CFR 1329.17; and
- h. A process to verify centers for independent living are eligible to sign the State Plan in compliance with 45 CFR 1329.17(d)(2)(iii).

(2) The SILC maintains regular communication with the appointing authority to ensure efficiency and timeliness of the appointment process.

(3) The SILC maintains individual training plans for members that adhere to the SILC Training and Technical Assistance Center’s SILC training curriculum.

(4) The SILC receives public input into the development of the State Plan for Independent Living in accordance with 45 CFR 1329.17(f) ensuring:

- a. Adequate documentation of the State Plan development process, including but not limited to, a written process setting forth how input will be gathered from the

state's centers for independent living and individuals with disabilities throughout the state, and the process for how the information collected is considered.

- b. All meetings regarding State Plan development and review are open to the public and provides advance notice of such meetings in accordance with existing State and federal laws and 45 CFR 1329.17(f)(2)(i)-(ii);
 - c. Meetings seeking public input regarding the State Plan provides advance notice of such meetings in accordance with existing State and federal laws, and 45 CFR 1329.17(f)(2)(i);
 - d. Public meeting locations, where public input is being taken, are accessible to all people with disabilities, including, but not limited to:
 - i. proximity to public transportation,
 - ii. physical accessibility, and
 - iii. effective communication and accommodations that include auxiliary aids and services, necessary to make the meeting accessible to all people with disabilities.
 - e. Materials available electronically must be 508 compliant and, upon request, available in alternative and accessible format including other commonly spoken languages.
- (5) The SILC monitors, reviews and evaluates the State Plan in accordance with 45 CFR 1329.15(a)(2) ensuring:
- a. Timely identification of revisions needed due to any material change in State law, state organization, policy or agency operations that affect the administration of the State Plan approved by the Administration for Community Living.
- (6) The SILC State Plan resource plan includes:
- a. Sufficient funds received from:
 - i. Title VII, Part B funds;
 - 1. If the resource plan includes Title VII, Part B funds, the State Plan provides justification of the percentage of Part B funds to be used if the percentage exceeds 30 percent of Title VII, Part B funds received by the State;
 - ii. Funds for innovation and expansion activities under Sec. 101(a)(18) of the Act, 29 U.S.C. Sec. 721(a)(18), as applicable;
 - iii. Other public and private sources.
 - b. The funds needed to support:
 - i. Staff/personnel;
 - ii. Operating expenses;
 - iii. Council compensation and expenses;
 - iv. Meeting expenses including meeting space, alternate formats, interpreters, and other accommodations;

- v. Resources to attend and/or secure training and conferences for staff and council members and;
- vi. Other costs as appropriate.

The signature below indicates the SILC's agreement to comply with the aforementioned assurances and indicators:

Jerry McCloskey
Name of SILC chairperson

Signature Date

Electronic signature may be used for the purposes of submission, but hard copy of signature must be kept on file by the SILC.

DRAFT

Section 9: Signatures

The signatures below are of the SILC chairperson and at least 51 percent of the directors of the centers for independent living listed in section 6.3. These signatures indicate that the Independent Living Council of Wisconsin and the centers for independent living in the state agree with and intend to fully implement this SPIL's content. These signatures also indicate that this SPIL is complete and ready for submission to the Independent Living Administration, Administration for Community Living, U.S. Department of Health and Human Services.

The effective date of this SPIL is October 1, 2020 (year)

SIGNATURE OF SILC CHAIRPERSON

DATE

Jerry McCloskey

NAME OF SILC CHAIRPERSON

Access to Independence

NAME OF CENTER FOR INDEPENDENT LIVING (CIL)

SIGNATURE OF CIL DIRECTOR

DATE

Jason Beloungy

NAME OF CIL DIRECTOR

Center for Independent Living for Western Wisconsin

NAME OF CENTER FOR INDEPENDENT LIVING (CIL)

SIGNATURE OF CIL DIRECTOR

DATE

Kyle Kleist

NAME OF CIL DIRECTOR

Independence First

NAME OF CENTER FOR INDEPENDENT LIVING (CIL)

SIGNATURE OF CIL DIRECTOR

DATE

Marci Boucher

NAME OF CIL DIRECTOR

Independent Living Resources

NAME OF CENTER FOR INDEPENDENT LIVING (CIL)

SIGNATURE OF CIL DIRECTOR

DATE

Kathie Knoble-Iverson

NAME OF CIL DIRECTOR

Midstate Independent Living Choices

NAME OF CENTER FOR INDEPENDENT LIVING (CIL)

SIGNATURE OF CIL DIRECTOR

DATE

Zoe Kujawa

NAME OF CIL DIRECTOR

North Country Independent Living

NAME OF CENTER FOR INDEPENDENT LIVING (CIL)

SIGNATURE OF CIL DIRECTOR

DATE

Jill Nyberg

NAME OF CIL DIRECTOR

Options for Independent Living

NAME OF CENTER FOR INDEPENDENT LIVING (CIL)

SIGNATURE OF CIL DIRECTOR

DATE

Sue Premo

NAME OF CIL DIRECTOR

Society's Assets, Inc.

NAME OF CENTER FOR INDEPENDENT LIVING (CIL)

SIGNATURE OF CIL DIRECTOR

DATE

Karl Kopp

NAME OF CIL DIRECTOR

Electronic signatures may be used for the purposes of submission, but hard copy of signature must be kept on file by the SILC.